

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
JAYNEE ALEXIS DAVIS, A/K/A	:	
JAYNEE A REEVES, A/K/A	:	
JAYNEE REEVES BAPTISTE	:	
	:	
Debtor(s)	:	No. 20-10767 amc

**ANSWER TO THE MOTION OF NEWREZ LLC D/B/A/ SHELLPOINT MORTGAGE
SERVICING FOR RELIEF FROM THE AUTOMATIC STAY**

COMES NOW, Jaynee Alexis Davis, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submit the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-7. DENIED. The averments contained in these Paragraphs consist of summarizations or mischaracterizations of documents that speak for themselves, and they are denied as no response is required.

8. DENIED. Debtor acknowledges falling behind with post-petition mortgage payments due to urgent unexpected home repairs, however, Debtor disputes the total amount of the arrears alleged in the Motion. Debtor is currently gathering proof of payments and will forward receipts to Counsel. Debtor is desirous of entering into a Stipulation with Movant to cure any remaining arrears.

9. DENIED.

10. DENIED. Debtor lacks sufficient information, knowledge, or belief to admit or deny this statement, therefore, it is denied.

11. DENIED. Debtor can neither admit nor deny this statement, therefore it is denied.

12. DENIED. Debtor can neither admit nor deny this statement, therefore it is denied.

13. DENIED. Debtor can neither admit nor deny this statement, therefore it is denied.

14. DENIED. Debtor can neither admit nor deny this statement, therefore it is denied.

15. DENIED. Debtor can neither admit nor deny this statement, therefore it is denied.

WHEREFORE, Debtor/Respondent prays that Movant's Motion be DENIED, and that

Debtor/Respondent receives judgment for reasonable costs and attorney fees incurred in connection with the defense of this Motion.

August 22, 2024

Respectfully submitted,

Law Offices of Michele Perez Capilato

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